

Subpart B Proposed Regulation, Deep Water Operations Plans OOC Comments

Proposed Regulation				Comments
§ 250.288 When must I submit a DWOP?				
You must submit, and MMS must approve, a DWOP before you conduct any activities associated with a development project that will involve the use of floating production systems or subsea production technology for all water depths.				<p><i>We note that in many cases subsea production technology has become “standard” and question the value of providing a full DWOP for all subsea wells at all water depths.</i></p> <p><i>Please clarify what is meant by “any activity”. In many cases, pre-engineering and fabrication may be initiated prior to the final project concept being selected. For example, fabrication of a subsea tree may be initiated prior to the well being drilled in anticipation that the well will be successful.</i></p> <p><i>The requirement should be that production is not initiated prior to the approval of a DWOP.</i></p> <p><i>It is noted that these regulations do not address the process of requirements for revising, updating or amending a previously submitted and approved DWOP. This was specifically addressed within NTL 2000-N06 and it is recommended that it similarly be addressed within this rulemaking.</i></p>
§ 250.289 Why do I need to submit a DWOP?				
A DWOP contains information specific to floating production systems or subsea equipment issues that allows MMS to determine if the project is being developed in an acceptable manner.				
§ 250.290 What are the three parts of a DWOP?				
You must prepare and submit your DWOP to the Regional Supervisor in three parts: the Conceptual Part, the Preliminary Part, and the Final Part, as required by the following table:				
Part	Purpose	Deadline for Submission to Regional	Other Requirements	(a) <i>Conceptual—It is unrealistic to expect operators to prepare a DWOP prior to selecting the development concept for the project.</i>

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(a) Conceptual	Addresses the general design basis and philosophy used to develop the field. Provides an early opportunity for MMS and you to agree on a development plan before you make major expenditures for engineering design.	Supervisor After you have identified the concept(s) for development and before you start engineering design.	You must prepare a Conceptual Part for all projects requiring a DWOP. (See § 250.291 for detailed content requirements.)	<p><i>In many cases, preliminary engineering design will commence on one or more concepts prior to the operator actually selecting the development concept for the project.</i></p> <p><i>(b) Preliminary—The system design may not be completed prior to starting the procurement and fabrication of system elements due to project schedules requiring the procurement and fabrication of some long lead items. Also, the Regional Supervisor should have the ability to waive the requirement for a PDWOP in any water depth that are similar to projects previously approved or where designs have become “standard” or where regulations for a particular component have been adopted and alternative compliance is not needed.</i></p> <p><i>(c) Final—submittal within 90 days of first production may be unrealistic. In many cases a well or wells may be brought on line to provide gas for the facility, etc that may not represent the operating conditions when the facility is fully operating.</i></p>
(b) Preliminary	Provides an opportunity for approval of the system and operations plan before you make major commitments and expenditures for hardware.	After you have substantially completed the system design and before you start procurement and fabrication, you may submit the Preliminary Part in several sections to suit the project schedule.	The Regional Supervisor must approve the Preliminary Part before you start production. The Regional Supervisor may waive the requirement for a Preliminary Part for subsea projects in water depths less than 1,312 feet (400 meters) that are similar to projects previously approved. (See § 250.292 for detailed content	

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(c) Final	Updates information previously submitted in the Preliminary or Conceptual Parts.	Within 90 days following initial production.	requirements.) None. (See § 250.293 for detailed content requirements.)	
§ 250.291 What must the Conceptual Part of a DWOP contain?				
The Conceptual Part of a DWOP must include the following information: (a) A location plat;				<i>There are no details of what should be included for parts (a), (b) and (c). These details have been provided within NTL 2000-N06 and it is recommended that they similarly be placed within the regulation unless MMS intends to retain a NTL providing this level of detail.</i>
(b) An overview of the development concept(s); and				
(c) Information concerning any temporarily abandoned well(s) that are being completed for production.				
§ 250.292 What must the Preliminary Part of a DWOP contain?				
The Preliminary Part of a DWOP must include the following: (a) A description and schematic of the typical wellbore, casing, and completion;				<i>There are no details of what should be included for parts (a) through (o).. These details have been provided within NTL 2000-N06 and it is recommended that they similarly be placed within the regulation unless MMS intends to retain a NTL providing this level of detail.</i>
(b) Structural design, fabrication, and installation information for each surface system;				
(c) Design, fabrication, and installation information on the mooring systems for each surface system;				
(d) Information on any active stationkeeping system(s) involving thrusters or other means of propulsion used with a surface system;				

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(e) Information concerning the drilling and completion systems;	
(f) Design and fabrication information for each riser system (e.g., drilling, workover, production, and injection)	
(g) Pipeline information;	
(h) Information about the design, fabrication, and operation of an offtake system for transferring produced hydrocarbons to a transport vessel;	
(i) Information about subsea wells and associated systems that constitute all or a part of a single project development covered by the DWOP;	
(j) A general description of surface production equipment. This may be in the form of a narrative or summary level diagrams. Identify the proposed fabrication, integration, and assembly locations of process equipment;	<p><i>MMS has requested that schematics showing the flow from the well to the first separation equipment be submitted. If this is what is wanted, then the requirement should reflect this information.</i></p> <p><i>What is the purpose of identifying the fabrication, integration and assembly locations of the process equipment?</i></p>
(k) A description of the surface/subsea safety system and emergency support systems;	
(l) A description of the well production allocation test process	
(m) A general description of the operating procedures, including a table summarizing the curtailment of production and offloading based on operational considerations and environmental conditions (winds, waves, and/or currents);	
(n) A description of the facility installation and commissioning procedure; and	
(o) A summary of the hazard analysis to identify, evaluate, and reduce the likelihood and consequences of uncontrolled hydrocarbon releases and other safety or environmental incidents.	
§ 250.293 What must the Final Part of a DWOP contain?	
The Final Part of a DWOP must include the following	

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information: (a) A statement about your adherence to the Preliminary Part of the DWOP;	
(b) A listing of any areas where the final configuration or operations differ from that approved under the Preliminary Part, with appropriate supporting documentation;	
(c) Where the final configuration or operation impacts areas approved under other submittals (plans, applications, permits, etc.), a discussion and resolution of such issues under the affected submittal; and	
(d) For multi-phased development concepts, an update, as applicable, of the status of future phases, and a prognosis for proceeding to the next phase.	
§ 250.294 Where do I send the DWOP?	
You must submit four copies of a DWOP to the MMS regional office at the applicable address shown in § 250.206(b).	
§ 250.295 When will the Regional Supervisor approve or disapprove the DWOP?	
The Regional Supervisor will either approve or disapprove a particular part of your DWOP within the following number of days after the Regional Supervisor determines that each part of your DWOP is complete: (a) Conceptual Part - 30 calendar days.	<i>How will we be notified that the DWOP has been deemed complete? We suggest that MMS should have a time limit to deem the DWOP complete (i.e., 10 working days).</i>
(b) Preliminary Part - 90 calendar days.	<i>We recommend that MMS shorten the approval cycle to 4 weeks if the operator makes an oral detailed presentation of the development plan to both the appropriate District and Regional MMS personnel and schedules a follow-up meeting to respond to any questions MMS has concerning the plan.</i>
(c) Final Part - 60 calendar days	